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September 17, 1999

Magalie Roman Salas
Office of the Secretary
Federal Communications Commission
445 12th Street, S.W.
Counter TWA 325
Washington, D.C. 20554

Re: **Amendment of Part 15 of the Commission's Rules
Regarding Spread Spectrum Devices
Notice of Proposed Rulemaking
ET Docket No. 99-231**

Dear Ms. Salas,

I am writing on behalf of Imagicast Corporation. to endorse the proposals set out in the above-referenced Notice of Proposed Rulemaking. Imagicast strongly supports the Commission's initiative to facilitate increased innovation and competition in the on-going development and use of broadband spread spectrum technologies at 2.4 GHz.

Our company and its customers benefit directly from improvements in data rates in spread spectrum technology in the 2.4 GHz band. In particular we supply interactive multimedia devices for use at retail, that require both the flexibility of a wireless LAN, and the maximum possible available data rates to support the transmission of audio and video content in a client-server environment.

Frequency hopping spread spectrum technologies are tailor-made for broadband applications. They are quite resistant to interference in this unlicensed communications band, which also is shared with such ISM devices as the ubiquitous microwave oven. They also consume very little power, which is a critical consideration for portable devices. Overall, frequency hopping technologies provide excellent cost/performance value.

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Adoption of the Commission's proposal, will mean that frequency hopping systems can more fairly access the available frequencies in the 2.4 GHz band. They will also be able to deliver higher data rates, while being backward-compatible with the installed base of existing, more narrow-band systems. The higher data rates made possible by the Commission's proposal will enable our company and our customers to realize additional benefits, such as faster file transfers, speedier Internet access, and enhanced multi-media experiences. Moreover, frequency hopping systems that comply with the proposed rules will not result in additional interference to existing users of the 2.4 GHz band. This point is very important to us because of our own installed base in this band.

For all these reasons, we urge quick adoption of the Commission's proposal in this proceeding.

Yours very truly,

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